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OF COUNSEL EDWARD A. CAINE*

> WRITER'S NUMBER (703) 812-

January 13, 1995

BY HAND DELIVERY

Mr. William F. Caton Acting Secretary Federal Communications Commission 1919 M Street, N.W., Room 222 Washington, D.C.

MM Docket No. 94-134, RM-8538

Dear Mr. Caton:

On behalf of KNAB, Inc., there is transmitted herewith an original and four copies of its Supplement to KNAB Comments and Counterproposal.

Should any questions arise concerning this matter, please contact this office.

RH/bll Enclosures

BEFORE THE

JAN 1 3 1995

Jederal Communications Commissionederal Communications commission Office of Secretary

WASHINGTON, D.C. 20554

In the Matter of)
Amendment of Section 73.202(b),) MM Docket No. 94-134
Table of Allotments,) RM-8538
FM Broadcast Stations)
(Burlington, Colorado;)
Brewster, Kansas))

SUPPLEMENT TO KNAB COMMENTS AND COUNTERPROPOSAL

On January 12, 1995, KNAB, Inc. filed its Comments and Counterproposal in the above-referenced matter. The statement in support of that document was contained in a xeroxed certification entitled, "Statement of Bette Bailly". The original copy of that document is attached to this submission and it is requested that it be made part of the docket in the above-referenced matter.

Respectfully submitted,

KNAB, INC.

Richard Hildret

/Ann Bavender

Anne Goodwin Crump

Its Attorneys

FLETCHER, HEALD & HILDRETH, P.L.C. 1300 North 17th Street, 11th Floor Rosslyn, Virginia 22209 (703) 812-0400

January 13, 1995



ABC - INTERMOUNTAIN NETWORKS - 1000 W DAYTIME

P.O. Box 516 BURLINGTON, COLORADO 80807

Phone 346-8600

"The People's Choice"

Statement of Bette Bailly

In the KNAB, KNAB-FM primary service area, which is that area within a 70-mile radius of Burlington, the AM radio stations include KNAB in Burlington, Colorado; KLOE in Goodland, Kansas; KXXX in Colby, Kansas; KRDZ in Wray, Colorado; and KLMR in Lamar, Colorado. FM radio stations include KNAB in Burlington, Colorado; KKCI in Goodland, Kansas; KGCR in Goodland, KAnsas; KQLS in Colby, Kansas; KATR in Wray, Colorado; and KSEC in Lamar, Colorado.

Daily newspapers include the Denver Post and Rocky Mountain News which are delivered daily from Denver, Colorado, and the Goodland Daily News from Goodland, Kansas. Weekly newspapers include the Burlington Record from Burlington, Colorado; the Limon Leader from Limon, Colorado; the Stratton Spotlight from Stratton, Colorado; the Sherman County Star from Goodland, Kansas; the Range Ledger from Cheyenne Wells, Colorado; the Wray Gazette from Wray, Colorado; and the Flagler News from Flagler, Colorado. There are also three weekly shopper papers in the area, including the Plains Dealer from Burlington, Colorado; the Mile Saver Shopper from Flagler, Colorado; and the Country Advocate from Goodland, Kansas.

There are two TV stations in the area--KLBY in Colby, Kansas and KBSL in Goodland, Kansas. Burlington and many of the towns in the surrounding area also have a Cable TV outlet that has a community channel that sells advertising. The Burlington cable system carries the following Denver television stations: KCNC-TV, KMGH-TV, KRMA-TV, KUSA-TV, and KWGN-TV. These five Denver television stations also are carried on the Kit Carson County television translator system.

Each of the above-listed media are received or delivered in Burlington. Additionally, all of the media with the exception of the Denver television stations and newspapers call upon advertisers in Burlington and Kit Carson County for the sale of time or newspaper advertising.



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The listed radio and non-Denver television stations can all be heard or viewed off the air during the daytime, and the same is true during the night with the exception of Stations KNAB AM and KLOE AM.

Burlington is a market that is extremely well-served by other media and with a flat economy that is dependent on ranching and farming, the economic picture is not going to change over the foreseeable future. The addition of another local broadcast facility to Burlington will create an economic condition for all the local broadcast stations that will result in none of the stations being able to adequately serve the public interest, and it can be expected that one or more of the stations will have to go dark.

As a station operator in Burlington for the past 27 years, I am personally familiar with these matters and the facts set forth above and in the foregoing comments and hereby affirm that the above statements are true and correct to the best of my knowledge, information and belief.

I hereby swear under penalty of purgery that the foregoing is true and correct to the best of my knowledge, information, and belief.

Bette Bailly

General Manager/Owner, KNAB, Inc.

January 12, 1995

CERTIFICATE OF SERVICE

I, Barbara Lyle, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C. do hereby certify that true copies of the foregoing "Supplement to KNAB Comments and Counterproposal" were sent this 13th day of January, 1995, by first class United States mail, postage prepaid, to the following:

Bruce Corman
Kay Hanley
Charley P. Barnes
c/o Charley P. Barnes
524 15th Street
Burlington, Colorado 80807

Barbara Lyle